

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Wells Fargo Bank, N.A.

101 North Phillips Avenue

Sioux Falls, SD 57104

*(In the space above enter the full name(s) of the plaintiff(s).)*

**- against -**

Vernon Williams©™ Judith Williams ©™

c/o 1204 Mount Vernon Street

Philadelphia County

Pennsylvania republic state [19123]

*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**I. Parties in this complaint:**

**A. List your name, address and telephone number.**

|           |                  |                           |
|-----------|------------------|---------------------------|
| Plaintiff | Name             | Wells Fargo Bank, N.A.    |
|           | Street Address   | 101 North Phillips Avenue |
|           | County, City     | Sioux Falls, SD 57104     |
|           | State & Zip Code | South Dakota 57104        |
|           | Telephone Number | 605-575-6900              |

Defendant(s)

Notice of Removal To the  
Clerk of the  
United States District Court  
Eastern District of Pennsylvania  
from

In the Court of Common Pleas of Philadelphia County  
First Judicial District of Pennsylvania  
Case ID 231003387 for removal

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No

(check one)

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

|                                   |  |
|-----------------------------------|--|
| Defendant No. 1<br>Petitioner     | Name <u>VERNON WILLIAMS ©™</u> Beneficiary     |
|                                   | Street Address <u>1204 MOUNT VERNON STREET</u> |
|                                   | County, City <u>PHILADELPHIA</u>               |
|                                   | State & Zip Code <u>PENNSYLVANIA [19123]</u>   |
| <br>Defendant No. 2<br>Petitioner | <br>Name <u>JUDITH WILLIAMS ©™</u> Beneficiary |
|                                   | Street Address <u>1204 MOUNT VERNON STREET</u> |
|                                   | County, City <u>PHILADELPHIA</u>               |
|                                   | State & Zip Code <u>PENNSYLVANIA [19123]</u>   |
| <br>Defendant No. 3               | <br>Name _____                                 |
|                                   | Street Address _____                           |
|                                   | County, City _____                             |
|                                   | State & Zip Code _____                         |
| <br>Defendant No. 4               | <br>Name _____                                 |
|                                   | Street Address _____                           |
|                                   | County, City _____                             |
|                                   | State & Zip Code _____                         |

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)
- ☒ Federal Questions      ☒ Diversity of Citizenship      Both questions apply
- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship South Dakota

Defendant(s) state(s) of citizenship Republic State Pennsylvania

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Philadelphia County or outside county in Pennsylvania upon defendants information and belief, see exhibits A-E

B. What date and approximate time did the events giving rise to your claim(s) occur? approximate dates on or around 12 / 11/ 2007 and on 12/ 27/ 2007. "exact dates is unbeknownst to the defendants, see exhibits A-E

What happened to you?

C. Facts: Cause of action arises from forged signatures used on counterfeit securities, see exhibits A-E

Who did what?

Plaintiffs used Pennsylvania State Notary Public officer and its employee to authenticate forged signatures on security instruments in some unknown location, see exhibits A-E

Was anyone else involved?

Those involved was Plaintiff's there employees] and Pa State Notary Public Officer named Craig Cotton. Upon defendants information and belief, see exhibits A-E

Who else saw what happened?

Those who saw what happen, was the person [s] who signed the forged securities, the plaintiffs and their employee and the Pennsylvania state Notary Public Officer Craig Cotton,see exhibits A-E

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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Defendants was injured financially and personally by the plaintiffs false misrepresentations, false statements, "Dolus" acts of forging securities in the name without our knowledge and consent; furthermore, enduring the personal embarrassment, unrelenting humiliation; thereby, committing damage to our collective character, in addition to diminishing the defendant's reputation and standing in our respective community.

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Relief: Court provide an order in favor of defendants against plaintiff in the amount of USD \$343,000. 00 for "Actual damaged", "Punitive damaged" in the amount of USD \$1,029,000.00 and "Statutory damages" in the amount of USD \$1,000,000.00

Provide a order to remove all plaintiff liens encumbrances, unknown forged an rubber stamped mortgages from the defendants property at 1204 Mount Vernon Street Philadelphia, Pennsylvania [19123] from the County of Philadelphia Recorder of Deeds Office.

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The basis for such compensation; the plaintiff false deceptive and DOLUS acts induced the unsuspecting defendants without a consummation of a contract between the parties to part with valuable economic resources

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I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10<sup>th</sup> day of December, 2023.  
signed without recourse without prejudice

Signature of A. Rep. POA William Vernon Ruvido  
Mailing Address c/o 1204 Mount Vernon Street  
Philadelphia Pennsylvania  
USPS [19123]  
Telephone Number 215-275-0480  
Fax Number (if you have one) non  
E-mail Address xyzcredit@gmail.com

State of Pennsylvania  
County of ~~PHILADELPHIA~~

} 38

Commonwealth of Pennsylvania - Notary Seal  
MUHAMMAD Y. ABDUL-MALIK, Notary Public  
Philadelphia County  
My Commission Expires April 1, 2025  
Commission Number 1000093

*Muhammad Y. Abdul-Malik*

EASTERN DISTRICT OF PENNSYLVANIA  
OFFICE OF CLERK UNITED STATES DISTRICT COURT  
600 MARKET STREET PHILADELPHIA, PA 19106-9865  
**Case Removal No. 231003387 To Federal Court**  
THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION-CIVIL  
**NOTICE OF REMOVAL**

**NOTICE OF REMOVAL: *WELLS FARGO BANK, N.A. vs Williams***

**ETAL October Term 2023 No.231003387**

TO: EASTERN DISTRICT OF PENNSYLVANIA OFFICE OF CLERK  
UNITED STATES DISTRICT COURT 600 Market Street  
Philadelphia Pennsylvania 19106-9865

Defendant's who is unschooled in law to notice this court of enunciation of principles as state in ***Haines v. Kerner***, 404 U.S. 519, and hereby make the following NOTICE OF REMOVAL without waiver of rights, remedies or defenses statutorily or procedurally at law and or in equity. Defendants reserves their rights to amend these pleadings upon new evidence in order that the truth may be ascertained and proceedings justly determined. Defendants hereby file the Notice of REMOVAL Case No. 23100338 from the Court of Common Pleas of Philadelphia County First Judicial District of Pennsylvania. Vernon Williams©<sup>TM2</sup>

<sup>2</sup> <https://bit.ly/47uF7Ef> and <https://bit.ly/451k0I0>

EASTERN DISTRICT OF PENNSYLVANIA  
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**NOTICE OF REMOVAL**

Defendants<sup>2</sup> pursuant to 28 U.S.C. §§ 1331, and 1332, and as grounds for its removal as follows: *And removed is within 30 day from date of service of the plaintiff complaint.*

*The plaintiff is a corporate citizen of South Dakota a corporation incorporated under laws of South Dakota with its principal place of business in South Dakota. The defendants are consumers, organic living soles and inhabited of Commonwealth of Pennsylvania.*

*The amount in controversy, without interest and costs, exceeds the sum or value specified by 28 U.S.C. §1332.*

**Statement of Claim:**  
**DEFENDANTS<sup>2</sup> COMPLAINT FOR REMOVAL**

The plaintiff false deceptive and DOLUS acts induced the unsuspecting defendants without a consummation of a contract between the parties to part with valuable economic resources.

EASTERN DISTRICT OF PENNSYLVANIA  
OFFICE OF CLERK UNITED STATES DISTRICT COURT  
600 MARKET STREET PHILADELPHIA, PA 19106-9865

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THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

TRIAL DIVISION-CIVIL

**NOTICE OF REMOVAL**

- A. Location of event gave rise in Philadelphia County and/or outside Pennsylvania county. Exact location unbeknownst to the defendants.
- B. Alleged dates of schemes by plaintiffs was on or around 12/11/2007 and 12/27/2007. Exact date and time is unbeknownst to the defendant's, see Exhibits A to E.
- C. Cause of action arises from forged signatures used on counterfeit securities executed by plaintiffs upon information and belief.
- D. Plaintiffs utilized a Pennsylvania State notary public officer to authenticate forged signatures and rubber stamped dates on security instruments; without the actual physical presence or signatures signed by the defendants.
- E. Those involved was Plaintiffs and its employee[s] and Pennsylvania State Notary Public Officer Craig Cotton upon information and belief.



EASTERN DISTRICT OF PENNSYLVANIA  
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FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION-CIVIL

**NOTICE OF REMOVAL**

F. Those who saw what happen was the person[s] who signed the forged securities; the plaintiffs and their employee[s] and the Pennsylvania State Notary Officer Craig Cotton upon information and belief.

G. Pennsylvania Notary Public laws; it is a mandatory requirement for the recording of entries with dates of service performed and executed with signatures of the parties who presented state photo ID; which shall be recorded into a Commonwealth of Pennsylvania Notary Public log record ledger. Upon information and belief.

H. Defendants where never present at any locations where the forged securities where executed; to present photo ID or sign a Pennsylvania State Notary log record ledger that shall provide authentication and identification of all parties present.

I. Defendants was injured financially and personally by the plaintiffs false misrepresentations, false statements, "Dolus" acts of forging securities in the

EASTERN DISTRICT OF PENNSYLVANIA  
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THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION-CIVIL

**NOTICE OF REMOVAL**

defendant's name without our knowledge and consent; furthermore, enduring the personal embarrassment, unrelenting humiliation; thereby, committing damage to our collective character, in addition to diminishing the defendant's reputation and standing in our respective community.

J.Relief, provide an order in favor of the defendants against the plaintiff in the amount of USD \$343,000,00 for actual damages, punitive damages in the amount of USD \$1,029.000,00 and statutory damages in the amount USD \$1,000.000.00.

K.Provide a order to remove all plaintiff liens encumbrances, unknown forged an rubber stamped mortgages from the defendants property at 1204 Mount Vernon Street Philadelphia, Pennsylvania [19123] from the County of Philadelphia Recorder of Deeds Office.

L.The bases for such compensation; the plaintiff false deceptive and "DOLUS" acts induced the unsuspecting

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FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION-CIVIL

**NOTICE OF REMOVAL**

defendants without a consummation of a contract between  
the parties to part with valuable economic resources.

M.All Court of Common Pleas Pennsylvania State Court  
records and files by the plaintiffs Case No.231003387  
is attached hereto with defendants answer; enclosed  
with this Notice Of Removal, and defendants Statement  
of Claim for Removal (check one) "Jury Trial"

[REST OF PAGE LEFT BLANK INTENTIONALLY]

EASTERN DISTRICT OF PENNSYLVANIA  
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FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
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I declare under penalty of perjury 28 U.S.C. 1746(1) that  
the foregoing complaint is true and correct upon  
information and belief so help my "God".

Signed by: William Vernon Ricardo, day of

12/11 2023,

Williams-vernon:ricardo©<sup>TM2</sup> A.R. Without Recourse

<sup>2</sup> <https://bit.ly/47uF7Ef> and <https://bit.ly/451k0I0>

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FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION-CIVIL  
**NOTICE OF REMOVAL**

CERTIFICATE OF SERVICE

I hereby certify that on \_\_\_\_\_, \_\_\_\_ a copy of  
Notice of Removal of complaint to federal court was send by  
first class United States Postal Service mail to:  
  
BROCK SCOTT PLLC 2011 RENAISSANCE BLVD SUITE 100  
  
KING PRUSSIA PA 19406 CAROLYN TREGLIA, ESQUIRE  
  
Attorney for the plaintiffs, Plaintiffs address Wells Fargo  
Bank N.A. 101 NORTH PHILLIPS AVENUE SIOUX FALLS SD 57104.

ss: VERNON WILLIAMS©™  
A.R. Without recourse  
c/o 1204 Mount Vernon Street  
Philadelphia Pennsylvania  
USPS [19123]

REC'D DEC 11 2023

JS 44 (Rev. 04/21)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

WELLS FARGO BANK NA

(b) County of Residence of First Listed Plaintiff SIoux FALLS SD  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

BROCK SCOTT, PLLC 2011 RENAISSANCE BLVD  
KING of Prussia, PA 19406 844-856-6646

## DEFENDANTS

WILLIAMS ETAL.

County of Residence of First Listed Defendant PHILADELPHIA PA  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                                       |   |                                       |                            |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|----------------------------|
|   | PTF                                   | DEF                                   |   | PTF                                   | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1            | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4            | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input checked="" type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6            | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT   |  | TORTS   |  | FORFEITURE/PENALTY   | BANKRUPTCY  | OTHER STATUTES |
|--|--|---|--|--|---|----------------|
| <input type="checkbox"/> 110 Insurance   | <input type="checkbox"/> 310 Airplane                              | <input type="checkbox"/> 365 Personal Injury - Product Liability                          | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 | <input type="checkbox"/> 422 Appeal 28 USC 158                           | <input checked="" type="checkbox"/> 375 False Claims Act                                      |                |
| <input type="checkbox"/> 120 Marine  | <input type="checkbox"/> 315 Airplane Product Liability            | <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability | <input type="checkbox"/> 690 Other                                       | <input type="checkbox"/> 423 Withdrawal 28 USC 157                       | <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))   |                |
| <input checked="" type="checkbox"/> 140 Negotiable Instrument                        | <input type="checkbox"/> 320 Assault, Libel & Slander              | <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability                   |  | <input type="checkbox"/> 820 Copyrights                                  | <input type="checkbox"/> 400 State Reapportionment  |                |
| <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment       | <input type="checkbox"/> 330 Federal Employers' Liability          | <input type="checkbox"/> 370 Other Fraud  |  | <input type="checkbox"/> 830 Patent                                      | <input checked="" type="checkbox"/> 410 Antitrust   |                |
| <input type="checkbox"/> 151 Medicare Act  | <input type="checkbox"/> 340 Marine                                | <input checked="" type="checkbox"/> 371 Truth in Lending                                  |  | <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application   | <input type="checkbox"/> 430 Banks and Banking  |                |
| <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) | <input type="checkbox"/> 345 Marine Product Liability              | <input type="checkbox"/> 380 Other Personal Property Damage                               |  | <input type="checkbox"/> 840 Trademark                                   | <input type="checkbox"/> 450 Commerce   |                |
| <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits           | <input type="checkbox"/> 350 Motor Vehicle                         | <input type="checkbox"/> 385 Property Damage Product Liability                            |  | <input checked="" type="checkbox"/> 880 Defend Trade Secrets Act of 2016 | <input type="checkbox"/> 460 Deportation  |                |
| <input type="checkbox"/> 160 Stockholders' Suits                                     | <input type="checkbox"/> 355 Motor Vehicle Product Liability       |   |  |  | <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations                   |                |
| <input type="checkbox"/> 190 Other Contract  | <input type="checkbox"/> 360 Other Personal Injury                 |   |  |  | <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)                            |                |
| <input type="checkbox"/> 195 Contract Product Liability                              | <input type="checkbox"/> 362 Personal Injury - Medical Malpractice |   |  |  | <input type="checkbox"/> 485 Telephone Consumer Protection Act                                |                |
| <input type="checkbox"/> 196 Franchise   |  |   |  |  | <input type="checkbox"/> 490 Cable/Sat TV   |                |
|  |  |   |  |  | <input type="checkbox"/> 850 Securities/Commodities/Exchange                                  |                |
|  |  |   |  |  | <input type="checkbox"/> 890 Other Statutory Actions  |                |
|  |  |   |  |  | <input type="checkbox"/> 891 Agricultural Acts  |                |
|  |  |   |  |  | <input type="checkbox"/> 893 Environmental Matters  |                |
|  |  |   |  |  | <input type="checkbox"/> 895 Freedom of Information Act                                       |                |
|  |  |   |  |  | <input type="checkbox"/> 896 Arbitration  |                |
|  |  |   |  |  | <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision |                |
|  |  |   |  |  | <input type="checkbox"/> 950 Constitutionality of State Statutes                              |                |

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
the amount in controversy exceeds the sum specified by 28 U.S.C. SEC. 1332

Brief description of cause: Plaintiff False deceptive and DOLUS acts induced the defendants without a consummation of a contract to part with valuable economic resources

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

12/11/2023

SIGNATURE OF [A.R. &amp; POA] OF RECORD

SS: VERNON WILLIAMS A. R. POA

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE